

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 19 CR 322-3
)	Judge Virginia M. Kendall
CHARLES CUI,)	
)	
Defendant.)	

**DEFENDANT'S UNOPPOSED MOTION
TO SUPPLEMENT THE RECORD ON APPEAL**

Defendant, Charles Cui, by counsel, hereby moves to supplement the record on appeal with Government Exhibits 81 and 275, and states as follows:

1. Mr. Cui has appealed his conviction and sentence imposed by the Court. The appeal has been fully briefed before the Court of Appeals. Oral argument was originally set for September 22, 2025, but that date has been stricken with a new date to be scheduled.

2. On June 3, 2025, the Court granted the government's motion to supplement the record on appeal with numerous exhibits. (Dkt. #558, 559). Mr. Cui's brief cited many of those same exhibits. Several exhibits cited in Mr. Cui's appellant's brief were not included in the government's motion, namely Government Exhibits 81 and 275. Those exhibits are attached to this motion.

3. Under Rule 10(a) of the Federal Rules of Appellate Procedure, "[t]he original papers and exhibits filed in the district court; . . . the transcript of

proceedings, if any; and . . . a certified copy of the docket entries prepared by the district clerk” constitute the record on appeal.

4. Because Government Exhibits 81 and 275 are not currently part of the record on appeal, counsel for Mr. Cui seek to supplement the record so that the exhibits are available for review by the Court of Appeals.

5. Undersigned counsel conferred with counsel for the government, who indicated that the government does not oppose this motion.

WHEREFORE, Defendant Charles Cui respectfully requests that the Court issue an order directing the clerk to supplement the record on appeal with Government Exhibits 81 and 275.

Respectfully submitted,

/s/ Susan M. Pavlow
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/s/ Joshua G. Herman
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